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24 *Plaintiffs*

25 UNITED STATES DISTRICT COURT

26 CENTRAL DISTRICT OF CALIFORNIA
27 SOUTHERN DIVISION

28 IN RE: TOYOTA MOTOR CORP.
UNINTENDED ACCELERATION
MARKETING, SALES PRACTICES,
AND PRODUCTS LIABILITY
LITIGATION

Case No. 8:10ML2151 JVS (FMOx)

RESPONSE REGARDING TOYOTA'S
FILING OF REDACTED / SEALED
DOCUMENTS ON CHOICE OF LAW

This Document Relates To:

ALL CASES

1 Toyota attempts to deflect its improper confidentiality designations by
2 accusing Plaintiffs of failing to follow the protective order procedures (*see* Dkt. No.
3 1288 p. 2 lines 21-23) and accuses Plaintiffs of “attempting to circumvent” the
4 Protective Order.

5
6 No such circumvention was intended, or took place. As Toyota notes in its
7 response “the Court invited Plaintiffs to submit their views” and we did so. The
8 Court asked Plaintiffs for their views and Plaintiffs properly expressed such views.
9 The facts stated are undisputed – Toyota has littered its filing with improper
10 confidentiality designations that are readily apparent – satellite litigation is
11 unnecessary.

12
13 Contrary to Toyota’s assertions, Plaintiffs, in tabular form, explained why
14 each of the documents was not entitled to confidential treatment – Toyota’s response
15 is basically silent on that issue.

16 Toyota now requests a briefing schedule (*Id.* at p. 4 notes 1 and 2), but
17 Plaintiffs suggest the Court has the documents and can determine without briefing if
18 a document is worthy of protection.
19

20
21 Dated: April 14, 2011

Respectfully submitted,

22 By: /s/ Steve W. Berman

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PROOF OF SERVICE

I hereby certify that a true copy of the above document was served upon the attorney of record for each other party through the Court's electronic filing service on April 14, 2011.

/s/ Steve W. Berman
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